Connecticut DOT's Preliminary Comments to AASHTO

Regarding Proposed Rules (NPRM) for Highway Safety Improvement Program (HSIP)

Updated 4/11/2014

These preliminary comments (in purple below) regarding the HSIP NPRM were generated by management and staff representing Connecticut DOT's (CTDOT's) Traffic and Safety Engineering Office, Work Zone Safety Office, Highway Rail/Grade Crossings Program, Office of Strategic Planning and Projects, Office of Roadway Information Systems and the Office of Coordination, Modeling and Crash Data.

Preliminary HSIP NPRM comments were coordinated and submitted to AASHTO on 4/11/2014 by:
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Specific HSIP NPRM Comment Areas Requested by FHWA:

1. **Economic, administrative, operational impacts of NPRM**

   What economic, administrative and operational impacts will the provisions included in this HSIP NPRM have on CTDOT? In other words, what are the specific burdens, impacts, and costs this HSIP NPRM has that are related to the:

   - *Development of the Strategic Highway Safety Plan (SHSP);*
   - *Implementation of the Railway-Highway Crossings Program; and*
   - *Programming of highway safety improvement projects*

   FHWA proposes to assess the level of programming of other eligible Federal funds prior to the approval of non-infrastructure safety projects utilizing HSIP funds. This may result in unnecessary delay if CTDOT has a compelling reason why other eligible funds are not fully programmed.

2. **SHSP update cycle and related costs**

   Will CTDOT be able to meet the 5 year SHSP update cycle and what will some of the costs be that are associated with producing this document?

   Yes, CTDOT will be able to meet the 5 year SHSP update cycle. The major cost for CTDOT is the fee to hire a consultant to develop/implement/evaluate the SHSP and the cost of an in-state peer exchange.

3. **Timeframe for establishing statewide LRS and collecting and implementing MIRE FDE**
   Will CTDOT be able to meet the following HPMS Linear Referencing System (LRS) deadline for establishing a statewide network that includes all public roadways as well as meet the USDOT deadlines for planning and collecting all of the new MIRE FDE data elements required on all public roads?

   - *June 15, 2014 - HPMS deadline to update statewide LRS to include all public roadways*
   - *July 1, 2015* – Implementation plan for collecting MIRE FDE*
   - *September 30, 2020* – Complete collection of MIRE FDE on all public roads*

   **Actual dates dependent upon effective date of final rule*

   CTDOT requested a one year extension from FHWA (until June 2015) to comply with new HPMS LRS requirements on all public roads. CTDOT is awaiting approval from FHWA. In addition, CTDOT requested and was approved a waiver from FHWA for a 1 year extension to comply with the new FHWA requirements regarding the urbanized area functional class adjustments.

   CTDOT expects to be able to comply with the estimated July 1, 2015 deadline for implementing a plan to collect all MIRE FDE on all public roads. However, it is unknown at this point as to whether CTDOT will be able to meet the estimated September 30th, 2020 deadline to complete the collection of all required MIRE FDE on all public roads. Aside from actually collecting MIRE FDE on all public roads, an even bigger challenge CTDOT faces is the ability to obtain accurate and reliable AADT counts statewide on all public roads. This is a higher priority for CTDOT because it will determine which MIRE FDE will be required on each public road.

4. **Additional data elements to collect to support safety analysis for all public roads**
   In addition to the MIRE FDE data elements required for collection on all public roads, what are some additional data elements that should also be collected to support safety analysis?

   More data inventory elements over and above the MIRE FDE will make for a better safety analysis. CTDOT is considering using AASHTOWare Safety Analyst. It appears the minimum data requirements for Safety Analyst are included in the MIRE FDE. However, if AASHTO could provide states a comprehensive list of additional roadway data elements that can be included in the Safety Analyst, it would help states identify, suggest and consider other potential safety data elements to collect in the field.

5. **Systems to support MIRE FDE collection efforts**
   What are the systems in place at CTDOT to support the required MIRE FDE data collection efforts?

   CTDOT is under contract with EXOR to build a statewide LRS that will include all MIRE FDE on all public roads. However, the collection of MIRE FDE is not part of the EXOR contract. CTDOT will be looking into the possibility of utilizing existing state as well as non-state resources to inventory MIRE FDE and collect AADT counts on all public roads. CTDOT requests support from AASHTO and USDOT in allowing states the greatest flexibility possible regarding the ability and ways to collect AADT and MIRE FDE on

all public roads. Wherever possible, CTDOT requests that AASHTO and USDOT provide states with resources and best practice guidance towards efficiently and effectively collecting this information in a uniform, yet flexible manner. This would include the use of algorithms to generate estimates for AADT on local roads. It would also include the flexibility to partner with non-state entities to assist with the inventory and estimates as well as the flexibility to use existing sample data sets such as HPMS and project information.

6. **Assumptions used in MIRE FDE benefit/costs estimation**

What are your thoughts about the assumptions FHWA made in estimating the MIRE FDE benefits and costs?

See MIRE FDE Cost Benefit Estimation Report:
http://safety.fhwa.dot.gov/rsdp/fhwasa13018updated.cfm

Costs based on what is not already being collected through HPMS and other efforts

- *Developing a statewide location referencing system (LRS) linkable with crash data*
- *Collecting the MIRE FDE on all public roadways*

Benefits associated with ability to better locate problem areas and apply appropriate countermeasures

- *Difficult to quantify, break even analysis used instead*

CTDOT has no comments to provide regarding the assumptions other than the costs seem low for Connecticut in terms of generating a statewide LRS and collecting MIRE FDE on all public roadways.

7. **Ways to improve benefits and usefulness to the State**

What are some of the ways that the HSIP can improve benefits and usefulness to the State?

Make HSIP funds exempt from obligation authority (ceiling). Consider revising or streamlining some of the Federal Aid requirements to make it easier to implement infrastructure safety improvements on local roads.

8. **Other facets of proposed rulemaking**

What are some general comments you may have regarding the HSIP NPRM that were not previously addressed?

Section 924.5 Policy--CTDOT agrees that safety improvements should be incorporated into projects funded by other Federal-Aid Programs. The policy says that the safety improvements that are provided by the broader Federal-Aid project should be funded from the same source as the broader project. This can be widely interpreted and it does not encourage or promote funding projects with multiple Federal-Aid Programs.